

Written Testimony Opposing HB 5537, Section 42 [6]

March 13, 2014

To Whom It May Concern:

My name is Rachel Fazio, and I have been working as a BCBA for about three years and in the field of ABA for about 6 years. As part of the extensive training I received in ABA, I had to have a master's degree in a related field (education) and complete 1500 hours of supervised field work in order to sit for the certification exam, standards set by the Behavior Analysis Certification Board (BACB). This Certificate is required to become a BCBA, and to oversee the practice of Applied Behavior Analysis.

I am writing to oppose HB 5537, Section 42 [6]. Speech and Language Pathologists have no formal training in behavior analysis, and they are not required to take any course work in the field either. They are also not bound to the same ethical guidelines set forth by the BACB. However, they are bound by their guidelines to only provide services within their scope of practice. Unless they have taken approved BACB course work, and completed approved BACB field work, overseeing behavior analysis would not be in their scope of practice. Although their services are an invaluable asset to clients, in my experiences, unless they are serving clients in a setting where programming is supervised by a BCBA, the approach is very different. It takes careful planning and collaboration to combine services to support a client appropriately. Therefore, approving SLP's to include behavior analysis in their scope of practice without training and course work would negatively impact consumers, and currently practicing Board Certified Behavior Analysts. It directly violates the ethical standards of a BCBA.

Furthermore, it is like asking someone trained in accounting to be qualified to work as a nurse. This would simply not even be thought of. The training is completely different. A side by side comparison of course work, standards and supervised experience can also support this.

I request that this bill not receive support.

Thank you for your time,

Rachel Fazio, BCBA

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